

Message

From: Ex. 6 Personal Privacy (PP)
Sent: 6/30/2021 5:01:49 PM
To: Ex. 6 Personal Privacy (PP)
CC: Siciliano, CarolAnn [Siciliano.CarolAnn@epa.gov]; Regan, Michael [Regan.Michael@epa.gov]; Grifo, Francesca [Grifo.Francesca@epa.gov]; Etzel, Ruth [Etzel.Ruth@epa.gov]; Jones Wanda K (OS) [wanda.jones@hhs.gov]; Francis Collins [collinsf@od.nih.gov]; Janet Woodcock [janet.woodcock@fda.hhs.gov]; Michelle Eby [Michelle.Eby@fda.hhs.gov]; rikeda@cdc.gov; Breyse, Patrick N. (CDC/DDNID/NCEH/OD) [pjb7@cdc.gov]; kbing@cdc.gov; Sven Rodenbeck [svr1@cdc.gov]; wcibulas@cdc.gov; jstephens@cdc.gov; hem0@cdc.gov; wolfe@niehs.nih.gov; Flowers Christine B (NIH/NIEHS) [E] [bruskec@niehs.nih.gov]; Neugeboren, Steven [Neugeboren.Steven@epa.gov]; Wehling, Carrie [Wehling.Carrie@epa.gov]; Messier, Dawn [Messier.Dawn@epa.gov]; Burneson, Eric [Burneson.Eric@epa.gov]; Rodgers-Jenkins, Crystal [Rodgers-Jenkins.Crystal@epa.gov]; Daniel Stocki [Ex. 6 Personal Privacy (PP)]; Mike Schade (Mind the Store) [mikeschade@saferchemicals.org]; vkapil@cdc.gov; carl.cranor@ucr.edu
Subject: Re: When Does Political Interference Become Fraud?
Attachments: Backup of Scientific Integrity at the Environmental Protection Agency.docx

Dear Readers,

Regarding scientific integrity at EPA Ex. 6 Personal Privacy (PP)
Ex. 6 Personal Privacy (PP)

I critiqued the 2012 SI policy, Ex. 6 Personal Privacy (PP)
Ex. 6 Personal Privacy (PP) Neither the 1999 nor the 2012 versions of an SI policy contained a process acceptable to the elected representatives of the Agency's staff. That fault remains to this day, protecting EPA management in whatever decisions they choose to make on use of science in policy making.

I attach a succinct analysis of the current state of SI at EPA which I submitted as an OP-ED to the Washington Post, receiving a rejection. It's now posted to the website www.epaunionhistory.org.

Ex. 6 Personal Privacy (PP)

Sent from my iPhone

On Jun 30, 2021, at 8:03 AM, Ex. 6 Personal Privacy (PP) wrote:

Dear Ms. Siciliano,

I am writing to follow up with Dr. Freedhoff's corrective response to the OIG in March, concerning known interference within OCSPP, and deviation from the integrity of science. I hope you and Mr. Tyler will share this email with her. Immediate action is requested.

This month a maternal benchmark dose analysis for fluoride was published. You can find it here for review:

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7654913/>

Regrettably, the CDC continues to expand, expose, and bankroll water fluoridation into rural water systems as safe. ATSDR is complicit. The role of CDC/NCEH/ATSDR to protect expectant mothers, once again, is usurped by industry interference, particularly the dental lobby. We have seen this over and over again by documents obtained through FOIA.

Will EPA attorneys step up now to the plate, and notify Judge Edward Chen that EPA no longer finds water fluoridation in the best interest of maternal and pediatric environmental health? Will Dr. Freedhoff call an interagency meeting to move forward with a moratorium on water fluoridation?

I want to reiterate what the OIG reminded Dr. Freedhoff of on EPA scientific integrity:

[EPA's Scientific Integrity Policy and Office]

"The Agency issued its Scientific Integrity Policy in 2012. The policy notes that science is the backbone of the EPA's decision-making and that the Agency's ability to pursue its mission to protect human health and the environment depends upon the integrity of the science on which the EPA relies.

According to the policy, all Agency employees, including scientists, managers, and political appointees, are required to follow the policy when engaging in, supervising, managing, or influencing scientific activities; communicating information in an official capacity about Agency scientific activities; and utilizing scientific information in making Agency policy or management decisions.

The EPA appointed a scientific integrity official in November 2013 to champion scientific integrity throughout the Agency. The SIO chairs a standing committee of deputy SIOs representing each EPA program office, including the Office of the Administrator, and region. These senior-level employees provide oversight for implementing the Scientific Integrity Policy at the EPA, act as liaisons for their respective programs and regions, and are available to address any questions or concerns on the policy.

To foster a culture of scientific integrity, the Agency's Scientific Integrity Policy identifies many ideals and actions. They include:

- Political or other officials should not suppress or alter scientific findings when operating a science and regulatory agency like the EPA.
- Reviews by Agency managers and other Agency leadership regarding the content of a scientific product are to be based only on scientific quality considerations. For example, they should review whether the methods used are clear and appropriate and the presentation of results and conclusions is impartial.
- Managers and other Agency leadership are prohibited from intimidating or coercing scientists to alter scientific data, findings, or professional opinions. In addition, policy makers shall not knowingly misrepresent, exaggerate, or downplay areas of scientific uncertainty associated with policy decisions.

The EPA OIG is responsible for investigating allegations of EPA-related misconduct. To support the OIG's mission, the EPA requires each employee to promptly report indications of wrongdoing or irregularities to the OIG, including indications of abuse of authority, mismanagement, and misconduct, including scientific misconduct.

Specifically, the EPA's Scientific Integrity Policy recognizes that the OIG will normally adjudicate allegations of scientific misconduct and requires the SIO to coordinate with the OIG on issues of scientific misconduct. As part of this coordination, the SIO is required to report a misconduct allegation to the OIG within seven days of receiving the allegation, and the OIG is required to report an allegation of research misconduct within seven days to the SIO in order to discuss the allegation, as appropriate.

Pursuant to the Inspector General Act of 1978, as amended, the OIG cannot disclose the identity of any EPA employee reporting allegations of misconduct unless that employee consents to disclosure or the inspector general determines that such disclosure is unavoidable during the course of an investigation. The SIO said that the Office of Science Advisor, Policy and Engagement, too, will not disclose the identity of any EPA employee reporting allegations to the extent the law allows."

[Federal and EPA Requirements on Being Transparent and Documenting Decisions]

"Throughout the EPA's history, administrators have reaffirmed a commitment to transparency in the Agency's operations. Administrator memorandums concerning transparency have become known as "fishbowl memos" because they stress that the Agency should operate openly and transparently, as if it were in a fishbowl.

Administrator Andrew Wheeler issued a memorandum on July 30, 2018, reaffirming that commitment, stating, "We are committed to earning and maintaining the public's trust through transparency and accountability in our actions." He also stated that the Agency's success depends on public trust and confidence.

Current Administrator Michael Regan continued this commitment in a memorandum dated April 12, 2021, wherein he stated that "public trust requires transparency." Moreover, the Scientific Integrity Policy notes linkages between being transparent and promoting a culture of scientific integrity.

Federal employees are required to maintain federal records per the Federal Records Act. Specifically, 44 U.S.C. § 3101 requires the head of every federal agency to make and preserve records containing adequate and proper documentation of policies and decisions. Per 36 C.F.R. § 1222.22, agencies must "document the formulation and execution of basic policies and decisions and the taking of necessary actions." The EPA's Interim Records Management Policy cites this language and implements this regulatory provision..."

I have read the fluoride TSCA bench trial deposition transcripts. I find the EPA scientific integrity is missing. The DOJ and EPA lawyers are dancing close to the line of fraud it seems to me.

I am a victim of a verified water poisoning from industrial toxicants. This poisoning occurred during two of my pregnancies that resulted in life altering harm to my children. I am appalled that EPA and DOJ hired industry consultants during the TSCA fluoride bench trial to defend battery and trespass against the integrity and personhood of pregnant women and their offsprings.

I am aware that cease and desist letters from scientists, and likewise scientific organizations long concerned about the safety of fluoridated water, are being drafted to be sent to CDC.

I have asked EPA Administrator, Michael Regan, to spearhead the effort to withdraw support for fluoridated water, and move forward to collaborate with HHS, NIH and FDA to issue a federal moratorium on water fluoridation.

I ask that Dr. Freedhoff participate as well in her commitment to science and the safety of chemicals, and not deviate due to unlawful political interference. This good faith measure will be evidence that EPA cares about maternal health and our future citizens.

Thank you,

Jill Jennings-McElheney

Ex. 6 Personal Privacy (PP)